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1.	Matthew Monsees	
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ACTION MEMORANDUM/OSC REPORT

SUBJECT: Justification for Initiation of Emergency Removal Action at the West Lees Mill Road Drum Site, Clayton County, Riverdale, Georgia

FROM: Matthew B. Monsees *MB* 3/31/93
On-Scene Coordinator (OSC)
Emergency Response and Removal Branch (ERRB)

TO: Site File
CERCLIS ID#: GAD984319749
Spill No.: 04JV

COPY TO: M. Doug Lair *ML*
Chief
ERRB

APR 22 5 17 AM '93
PROCUREMENT CONTRACTS
EPA REGION 4
ATLANTA, GA.

I. Purpose

The purpose of this Memorandum is to provide justification for initiation of emergency response removal action at the subject site, as well as to serve as the OSC Report for this site. The OSC issued verbal Delivery Order (DO) 4001-F4-053 in the amount of \$10,000.00 for emergency response services to EPA's first response contractor OHM Remediation Services, Inc., Contract No. 68-S1-4001. The DO was issued pursuant to limited procurement authority (No. 87-26-A0008-B-0321) delegated to the OSC by EPA PCMD.

II. Site Conditions and Background

On March 6th, 1993, at approximately 1930 hours, the ERRB duty officer dispatched OSC Monsees to the scene of three abandoned drums located near the intersection of Lee Mill Road on West Lee Mill Road near the town of Riverdale, GA. County EMA and Fire Department personnel were on scene and were requesting cleanup and removal assistance.

The drums had apparently been dumped by an unknown entity. The Georgia EPD had declined to participate in drum removal and disposal activities purportedly due to a lack of funds. Based on this situation and the need for a continued response, EPA assumed the "Lead" agency role as defined in the NCP Section 300.5.

The drums were found to be lying on their sides, and one was leaking an oily solvent-like substance to the ground. Based on the OSC's observation of the ongoing release of a suspected hazardous substance, combined with an inability on the State's part to properly respond, and the lack of immediately identifiable PRPs, the OSC initiated a response in accordance with NCP Section 300.130 criteria, and issued the above referenced DO to the ERCS contractor for emergency response and cleanup services.

III. Actions Taken

Response operations included overpacking of the three drums and excavating the visibly contaminated soil into two 85-gallon overpack drums. The drums were manifested to MKC, Inc., a local TSD, and will be stored at this facility until waste profiling and disposal is completed.

Based on the limited extent of release, the OSC does not anticipate that further action by ERRB is required.

IV. Estimated Costs

The DO issued for \$10,000.00 is sufficient for the ERCS portion of project activities. Approximately 65% of the DO amount is anticipated to be spent upon DO definitization, at which time the remaining funds will be deobligated.

TAT contractor response was not required for this site and therefore a TDD was not issued and there should be no cost to the government.

Intramural EPA costs are not expected to exceed \$5,000.00.

This document, in addition to providing justification for the Removal Action, describes the events that took place as part of the Removal Action at the subject site. To assist enforcement personnel with developing a litigation report for cost recovery purposes, some citations of regulations are noted to show conformance by the OSC with the NCP. However, for complete and detailed legal justification for this removal action, the litigation report should be referred to.